

**Before the Federal Communications Commission
Washington, D.C. 20554**

In the Matter of
Lifeline and Link Up Reform and Modernization

Lifeline and Link up

Federal-State Joint Board on Universal)	WC Docket No. 11-42
Service)	WC Docket No. 03-109
)	CC Docket No. 96-45
)	WC Docket No. 12-23
Advancing Broadband Availability Through)	
Digital Literacy Training.)	
)	
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Puget Sound Educational Service District 121 Comments on Lifeline Notice
April 20, 2012

I. Background

Puget Sound Educational Service District 121 is one of nine regional educational agencies serving school districts and state-approved private schools in Washington State. Our function is primarily as support agencies and we deliver educational services that can be more efficiently or economically preformed regionally. We are located in the Puget Sound Region of Washington State and provide services to those school districts and private schools within the King and Pierce County regions. Our legislated responsibilities are to: provide cooperative and informational services to local school districts; provide services to school districts to assure equal educational opportunities; and assist the Superintendent of Public Instruction and the State Board of Education in the performance of their duties. Puget Sound ESD sets outcomes, or "Ends", annually. These Ends guide our work on behalf of the educational communities we serve.

Our over-arching End is Success for Each Child and Eliminate the Opportunity Gap by 2020. Our sub-ends are: Success in Student Learning; Economic Efficiencies & Resources; and Family & Community Engagement.

The Services we provide:

Our programs and services continuously evolve in response to the needs of educational communities in our region. We develop and deliver a wide selection of services that provide instructional and administrative support to schools and direct service to students and families. Depending on the program, our services may be provided at no charge to the user, contracted as needed, or may require annual membership.

Departments and types of services offered include:

Administrative Services: cost-saving insurance cooperatives; teacher certification; school emergency communications; grants services; education television channel.

Early Childhood and Family Support Services: infant and preschool programs; comprehensive education, health, nutrition, and social services for 3,600+ preschool children and their families; education, involvement, and job readiness opportunities for parents; training and support for the child care community.

Financial Services: group financing and/or purchasing cooperatives; technical assistance and consultation on school financial issues; pools and cooperatives for administrative support; pupil transportation coordination; and state reporting functions.

Learning and Teaching Services: research; evaluation and assessment; school improvement; prevention services; school, family and community partnerships; professional development; teaching support; and clock hours.

1 **Special Services:** programs for students with special needs; assistance with the design
2 and effective evaluation of programs; services for children with vision impairment,
3 hearing loss, and deaf-blindness, age's birth through 21.

4 **Technology Services:** assistance to schools and school districts in planning for
5 educational technology; E-Rate consulting services; network services; software
6 purchasing programs; web and software development; videoconferencing; and library and
7 media services.

8 **Our Service Area**

9 Our service area includes 35 school districts and more than 200 private schools in
10 King and Pierce counties plus Bainbridge Island. Approximately 38 percent of the
11 state's K-12 public school students, more than 383,000, are served in the area's
12 school districts, which range from large to small, urban to rural. (Puget Sound ESD)

13
14 **Advancing Broadband Availability for Low-Income Americans through Digital Literacy**
15 **Training:**

16 In its most recent Further Notice of Proposed Rule Making (FNPRM), the Commission
17 proposes to modernize the Universal Service Fund's (USF's) Lifeline program, which
18 subsidizes telephone service for low-income citizens. Within the FNPRM is a proposal
19 to establish a Digital Literacy pilot program (pilot), which would fund schools and
20 libraries operating digital literacy training courses. The FNPRM recommends that the
21 pilot operate for four years, costing \$50 million per year, with libraries receiving
22 80 percent of the funding and schools the remaining 20 percent. The FNPRM proposes
23 three options for administering the pilot, including: operating the pilot within the
24 USF Low Income program; running the pilot through the E-rate program, which would
25 require rule and E-rate Eligible Services List changes; or establishing a separate
26 program within the USF.

1 **II. Puget Sound Educational Service District's Response to the Digital Literacy**
2 **Pilot program Proposal**

3 In response to the FNPRM and the two key issues of how the proposed Digital Literacy
4 pilot will be funded and then administered, Puget Sound Educational Service District
5 offers the following:

- 6 1) We see this as a vital function and role in the educational realm and feel that
7 digital literacy training should be a priority in our nation. We agree whole-
8 heartedly with the FCC's plan to implement the Digital Literacy Pilot and thus
9 expanding Broadband to more Americans, particularly our lower income families.
10 We, in the educational community, see daily the struggles that our districts
11 have in procuring and maintaining a high speed broadband link. We see the need
12 to provide students with Internet Access after school hours. We see the
13 struggles our immigrant families, low income families and those who struggle
14 with understanding and using technology. Unfortunately, these obstacles hinder
15 our students' ability to compete for learning opportunities and jobs in the 21st
16 century and also contribute to the Opportunity Gap in Washington State. We are
17 failing to keep up with other world neighbors in the Digital Technology realm.
- 18 2) We, in the Education realm, see a great need to continue to build the
19 infrastructure to support the implementation and use of high speed broadband.
20 In Washington State, we are seeing the Opportunity Gap widen within our state,
21 especially in our rural areas where it is too costly to run a fiber build.
22 Available E-Rate funding for schools provides the opportunity for our school
23 districts to close or eliminate the digital divide which is crucial for the
24 future success of our students. In Washington State, our school district's
25 budgets have been continually slashed and so many valuable programs have been
26 placed on the butcher block and either eliminated or cut so drastically that
27 sustaining the program is no longer viable for a school district. We believe
28 that in the 21st century, digital skills are essential for our students and

1 their families to fully participate in civic life and our nation's economy. We
2 believe that our nation's public libraries have so much to offer to our
3 citizens and that using the libraries to facilitate the Digital Learning
4 Training makes the most sense. We also see that the schools play an important
5 role in this learning, but to a less degree as most schools have some sort of
6 digital learning incorporated in their curriculum already. For Instance, in
7 Washington State, our state has established the following standards for Digital
8 Literacy for our students:

- 9 3) **Standards & Assessments:** The standards for educational technology are designed
10 as grade level expectations for the use of digital technologies. They work
11 compatibly, and practically, within Washington's teaching and learning
12 environment. The assessments for educational technology have been integrated
13 into the core content areas – science, math, health, English language arts,
14 social studies and the arts. They include a checklist for K-12 teachers and
15 offer a comprehensive inventory of free and low-cost digital resources.

16 ❖ **Learning Standards:** Each standard is accompanied by realistic classroom
17 activities that use very little technology – an internet connection and a
18 PC – equipment we know is available in 99%+ of state classrooms, as well
19 as activities well-suited to learning environments in which technology is
20 abundant.

21 ❖ **Assessments:** Assessment activities are well guided, easy to use and come
22 equipped with a comprehensive inventory of free and low-cost digital
23 resources. Teachers will use these assessments to determine student
24 progress toward Washington's standards for educational technology.

25 <http://www.k12.wa.us/EdTech/StandardsAssessments.aspx>

- 26 4) Puget Sound Educational Service District fully supports the FCC's proposal that
27 will allow the pilot to be funded through the USF High Cost or Lifeline
28 Programs, however, we do not support the use of the E-Rate program funds to

1 funnel this project through. We strongly believe that if this program is added
2 to the E-Rate program, the burden would be great and the effectiveness of the
3 program administrators would be greatly impaired. As it is now, we still have
4 several school districts and schools within Washington State that are still
5 awaiting Funding Commitment Letters for Fund Year 2011 and it is mid-April
6 2012.

7 5) School Districts are already struggling with the burden of the paperwork and
8 the strict time-lines, let alone the long waiting period for the funding
9 commitments. To add more stress and burden to this program would cause
10 struggling school districts to walk away from this program entirely.

11 6) The E-Rate Program is a complex and complicated filing process with many layers
12 of grey areas. There is miscommunication between the different divisions within
13 this program which often leaves the applicant feeling that the left hand of the
14 E-Rate Program doesn't know what the right hand of the E-Rate Program is doing.

15 Excerpt from EdLiNC :

16 Administrative Processing Burden: The SLD is already functioning at full capacity, processing thousands of
17 applications and appeals annually and engaging in applicant audits, site visits and other program integrity and
18 outreach activities. In 2010, SLD received and processed 43,866 applications and 1,959 appeals. Processing all of this
19 material takes a significant amount of time: applications from Program Year 2010, which officially ended June 30,
20 2011, were still being processed as of March 2012. Further, the 1,959 appeals filed in 2010 took, on average, between
21 44 days and 102 days to resolve. Additionally, SLD conducted over 270 outreach visits to applicants in 2010. In the
22 fall of 2011, it conducted eight applicant training sessions at sites around the country. Based on this high volume of
23 activity, it is unreasonable to expect the SLD to absorb the administration burdens of the pilot. According to the
24 FNPRM, the Commission anticipates making awards to 4,800 eligible entities each year. If only 4,800 entities applied,
25 SLD would still see a greater than 10% increase in its application processing burden. Further, with the FNPRM
26 proposing that funds be limited "to entities that do not already offer formal digital literacy training
27 services...whether derived from public or private sector sources," SLD will have to expend significant time on each
28 application to ensure that the entity is not in fact offering digital literacy training already. (EdLiNc, 2012)

Conclusion

Puget Sound Educational Service District applauds the Commission for proposing the Digital Literacy Training Pilot Program. We appreciate the Commission's efforts to protect the already overburdened E-Rate Program by not supporting the pilot with the E-Rate resources. We urge the Commission to implement and administer the Digital Literacy Training Pilot Program by creating a program within the existing Lifeline program. These options will greatly reduce the likelihood of even more significant administrative disruptions to the E-Rate Program's applications, administration and appeal processes.

Sincerely,

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